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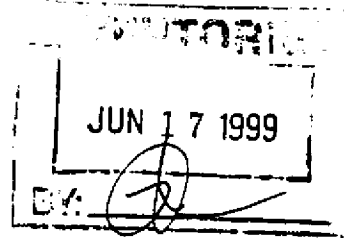
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June 16, 1999

WHC-Six Real Estate Limited Partnership  
600 E. Las Colinas Boulevard  
Suite 1900  
Irving, Texas 75039



**RECEIVED**  
**JUN 17 1999**  
**ARCHON GROUP, L.**

**Re: Phase I Environmental Assessment Update**  
**Los Nietos Business Center**  
**9120-9160 South Norwalk Boulevard and 11925-11933 East Los Nietos Road**  
**Santa Fe Springs, California 90670**  
**Hygienetics Project No. 4433.011**

Dear Ms. Ingram:

Hygienetics Environmental Services, Inc. (Hygienetics) is pleased to submit this report which provides an update to the Phase I Environmental Site Assessment Update report prepared in April 1996. The work was conducted in accordance with Archon Task Order No. 1009-1019 approved on May 13, 1999.

The purpose of this investigation was to update the findings of the "Phase I Environmental Site Assessment Update, Bank of America Asset No. BA-10100 for the Los Nietos Business Center at 9120-9160 South Norwalk Boulevard and 11925-11933 East Los Nietos Road in Santa Fe Springs, California" prepared by Fugro West, Inc. for WHC-One Real Estate Limited Partnership, dated April 1996 and provide a summary of any changes in Site conditions. Interviews with key Site and regulatory personnel, a Site reconnaissance and new database search were conducted in order to complete this update. In addition, Hygienetics conducted a radon in air survey as part of this update; however, no additional environmental sampling was conducted at the Site.

### Previous Reports

Hygienetics reviewed the following eight reports for the subject Site:

1. Toxic Hazard Assessment Conducted at the Armco Inc. Facility, dated May 3, 1988 and prepared by Applied Geosciences Inc. (AGI);
2. Site Remediation Report Armco Inc. Site, dated July 27, 1988 and prepared by AGI;
3. Phase I Environmental Site Assessment (ESA) Los Nietos Business Center, dated September 2, 1993 and prepared by Ceres Environmental (Ceres);

4. Phase I ESA Update of Los Nietos Business Center, dated April 19, 1994 and prepared by Science Engineering & Analysis Corporation (SEACOR);
  5. Phase II Report of Subsurface Investigation of Los Nietos Business Center, dated May 9, 1994 and prepared by SEACOR;
  6. Summary of Environmental Activities at the Newcrow VII Property Located in Santa Fe Springs, California, letter report dated June 12, 1995 and prepared by AGI;
  7. Phase I ESA Update Los Nietos Center, dated April 1996 and prepared by Fugro West, Inc. (Fugro);
  8. Addendum to Phase I ESA Update, dated July 2, 1996 and prepared by Fugro.
1. The May 1988 AGI Toxic Hazard Assessment report discussed and concluded the following:
    - From the years 1924 to 1953 the subject Site was occupied by California Fishing Tool and Machine Company (CFTMC), which manufactured down-hole oil well production equipment. The equipment manufactured on-Site included hydraulic well pumps, rod pumps, fluid control systems, valves, fittings and pipes. Manufacturing processes included cutting, honing, grinding, straightening, spray welding, grit blasting, painting, heat treating, and cleaning. In 1959 the subject Site was sold to National Supply Company (NSC), who added 8.0 acres to the 3.7 acres previously occupied by the CFTMC and expanded its warehousing, machining, and testing facilities. Armco Inc. purchased the NSC in 1987. Former on-site sumps and clarifiers were emptied and were steam cleaned, as were the floors and walls of the on-Site buildings, to remove all oily residue.
    - As part of the Toxic Hazard Assessment, geochemical sampling was performed by AGI in two phases, with phase I occurring July 30-31, 1987 and phase II occurring August 31 and September 1-2, 1987. Thirteen (13) vertical borings, five (5) angle-drilled borings, and thirty-one (31) hand auger borings were advanced in the northern, southern, eastern, and central areas of the subject Site. The samples were collected in the northern area in the proximity of a former oil storage house, machine shop, welding shed, and Site boundary. The samples collected from the eastern area were located near a second machine shop and the Site boundary. The samples were collected from the southern area in the proximity of a raw material warehouse, grinding department, and the southern parking lot. The samples collected in the western area were in the vicinity of the grinding department and office area. The samples collected in the central area were in the vicinity of the heat treating department, hydraulic assembly department, honing department, inspection department, and the center point of the Site. A total of 148 samples were collected, 73 of which were tested using some or all of the following analyses: Total Petroleum Hydrocarbons (TPH) via EPA Method 418.1, Volatile Organic Compounds (VOCs) via EPA Method 8240, Base Neutral Acids via EPA Method 9010 and "CAM" metals, including soluble components via EPA Method 6020. Analysis of these samples indicated elevated levels of TPH in the northern, eastern, southern (in a former on-Site French drain), and central areas. Elevated levels of metals and select solvents were detected the samples analyzed from the southern area of the Site.

- Four registered underground storage tanks (USTs) were located on the subject Site.
  - PCB-containing transformers and other equipment were located on the subject Site.
  - AGI noted the presence of 12 square feet (sf) of asbestos-containing materials in the former on-Site buildings.
  - Approximately 1,500 cubic yards of soil contaminated with heavy hydrocarbons (oil) and select metals were located on-Site.
  - Hydrocarbon contaminated soil was reported at depths of 48 feet below ground surface (bgs); however, the lower extent of contamination was unknown.
2. The July 1988 AGI Site Remediation report discussed and concluded the following:
- TPH and heavy metal contaminated soil was excavated from the subject Site. The excavated soil was stockpiled and segregated by contaminant type on visqueen plastic in the areas of respective excavations. The bottom soils in the excavations were sampled and analyzed for TPH and "CAM" metals. The results of these analyses indicated that the concentrations in the soil were below the concentration criteria, based upon current regulatory guidelines, utilized in classifying soil as hazardous waste. Therefore, the remaining soil did not require further excavation.
  - Four USTs were removed from the subject Site and the soils in their respective excavations were sampled and analyzed, under the supervision of the LADPW.
  - No on-Site source was discovered during either the initial toxic hazard assessment or the Site mitigation/demolition/excavation that would be a likely contributor to groundwater contamination.
  - On February 13, 1990 Trammell Crow Company, the Site developer, received a UST Closure Certification Letter from Chief Carl W. Sjoberg of the LADPW for the 9100 Norwalk Boulevard facility (Closure Permit No. 3874B) for the final closure report submitted November 28, 1989.
3. The September 1993 Ceres Phase I ESA report discussed and concluded the following:
- The Phase I ESA performed by Ceres included a Site reconnaissance, a review of previous reports, and a review of agency file and historical information. Hazardous materials storage was noted on-Site and hazardous materials business plans and material safety data sheets were on-file with the Santa Fe Springs Fire Department. No improper chemical storage was noted. Ceres noted that oil production in the area of the Site, as well as nearby industry, has affected groundwater; however, Ceres deemed it unlikely that groundwater contamination from the properties in the vicinity of the Site would affect the Site itself.

- A review of building permits indicated the 1988 demolition of the buildings at 9100 South Norwalk Boulevard (Armco/Trammell Crow). Permits to construct the current on-Site buildings were issued for the 9160, 9140, and 9120 South Norwalk Boulevard buildings on January 12, January 27, and February 29, 1988, respectively. A permit to construct the current on-Site building at 11925 East Los Nietos Road was issued on March 23, 1988. Certificates of Occupancy were issued for the 9130 and 9120-9128 South Norwalk Boulevard, 11925-11933 East Los Nietos Road, and 9154 South Norwalk Boulevard buildings on September 22, October 4, October 13, and February 8, 1989, respectively.
4. The April 1994 SEACOR Phase I ESA update report, based upon a review of the Ceres 1993 Phase I ESA and a Site investigation, discussed and concluded the following:
- Due to the past industrial use of the subject Site, SEACOR concluded that there might be a potential for on-Site contamination due to the former use of solvents, petroleum hydrocarbons, heavy metals, and other hazardous materials.
5. The May 1994 SEACOR Phase II investigation report discussed and concluded the following:
- Analysis of four shallow soil samples, which were collected from various locations on the northern portion of the Site, indicated TRPH concentrations ranging from 28 to 9,400 ppm at 1.5 bgs. Analysis of soil samples collected from the same borings, BH-1 through BH-4, and at a depth of 15 feet bgs do not indicate detectable TRPH concentrations. Approximately 667 to 1,000 cubic yards of on-site soil were impacted by TRPH exceeding the state action level of 1,000 ppm. Analysis of samples collected from the subsurface soils at the Site indicated concentrations of priority pollutant metals that were below the recommended state action level for metals, which was ten times the Soluble Threshold Limit Concentration (STLC). Analysis of the sample obtained from BH-2 indicated lead concentrations that exceeded ten times the STLC; however, the concentration was below the Total Threshold Limit Concentration (TTLCL).
6. The June 1995 AGI summary of environmental activities letter report, which was derived from information gathered in the AGI 1988 Toxic Hazard Assessment, the AGI 1988 Site Remediation Report, and the AGI 1994 Groundwater Information letter report (not reviewed by Hygienetics), discussed and concluded the following:
- The extent of impacted soils seemed to extend off-Site along the northern and southern boundaries. The southern portion of the Site was given to the City of Santa Fe Springs, which used the land in the realignment of East Los Nietos Road. Any contaminated soil was assumed to have been excavated during road construction.
  - Three off-Site facilities, which are located potentially up-gradient to the Site, were conducting groundwater investigations. Two facilities, Southern California Chemical

Company and McKesson Chemical Company, were reportedly responsible for i the groundwater with chlorinated hydrocarbons [trichloroethene (TCE), P dichloroethene (DCE), and 1,1-dichloroethane (DCA) and other constituents (methylene chloride, chloroform, benzene, toluene, xylenes, ethylbenzene, and heavy metals)]. The third facility, Diversy Wyandotte Corporation, had not yet conducted its groundwater investigation. AGI concluded that the elevated concentrations of chlorinated hydrocarbons, such as TCE, in monitoring wells up-gradient and down-gradient from these facilities appears to indicate a regional TCE groundwater problem. Reportedly, Cal-EPA was investigating this concern in October 1994.

- In January 1995 AGI installed five (5) groundwater-monitoring wells on-Site. Soil samples collected during the installation of the wells did not indicate detectable concentrations of TRPH or VOCs. Depth to groundwater was 35 to 45 feet bgs and the direction of groundwater flow was calculated to be to the south.
  - In February and March 1995, groundwater samples and analysis indicated elevated concentrations above the state maximum contaminant levels (MCLs) of chlorinated hydrocarbons (PCE and TCE especially) in the wells installed in "down-gradient" areas of the Site. Samples from the most up-gradient well on-Site indicated low concentrations of PCE and TCE. TRPH was not detected in any of the samples analyzed.
7. The April 1996 Fugro Phase I ESA update report, which included a review of the 1988 AGI Toxic Hazard Assessment, the 1988 AGI Site Remediation report, and the Ceres Phase I ESA, and groundwater well sampling, concluded the following:
- Prior to development for its current use as an industrial/warehouse business center, the Site was utilized for the production of down-hole oil well production equipment from 1924 to 1953 and for warehousing, machining, and testing facilities from 1959 to 1988.
  - No evidence suggesting the presence of any existing USTs or aboveground storage tanks (ASTs) was noted on the subject Site. Based upon a review of previous environmental investigations, a total of eleven dry wells, five in the proximity of the southwest corner and six located on the northern portion, were located on the subject Site. Previous soil sampling efforts in the vicinity of the six southwestern wells did not indicate an environmental concern to the Site. The five dry wells in the northern portion of the Site were reportedly removed during excavation of the Site and two of the six dry wells from the southwestern portion may still be located on-Site. Additionally, four USTs were formerly located on the subject Site; however, these were removed and closure was attained from the LADPW as previously mentioned.
  - Hazardous materials storage was noted at Air Cruisers Company, an on-Site tenant located at 9140 South Norwalk Boulevard, in the form of methyl ethyl ketone (MEK), isopropanol, toluene, and other materials. Hazardous materials storage was also noted at JSW Plastics Machinery, a former on-Site tenant, in the form of hydraulic oil, motor oil,

and paint; and at Advance Business Graphics, in the form of printing and development fluids.

- No sampling for radon gas was performed for the subject Site due to the U.S. EPA Zone 2 designation for Los Angeles County, which predicts an average indoor screening level greater than or equal to 2.0 picoCuries per liter (pCi/L) and less than or equal to 4.0 pCi/L. A concentration of 4.0 pCi/L is the EPA threshold limit for radon gas for residential property.
- No asbestos-containing material sampling was conducted due to the 1988-89 date of building construction.
- No lead-based paint sampling was performed during this assessment due to the 1988-89 construction date.
- In conjunction with the April 1996 Phase I ESA update, on March 29, 1996, the five on-Site groundwater-monitoring wells were purged and sampled by Fugro, and analyzed for TPH full fingerprint, VOCs, and a 17 metal scan. TPH was not detected in any of the five samples. The metals present were at normal background levels except for the sample collected from well MW-4, the analysis of which indicated concentrations of cadmium, chromium, nickel, selenium, and silver in excess of the MCL. Various VOCs, all related to halogenated solvents, were detected in all five samples. Results did not conclusively attribute the contamination to the former on-Site operations or to the regional groundwater contamination problem.

8. The July 1996 Fugro addendum discussed and concluded the following:

- At a Resource Conservation and Recovery Information System (RCRIS) property, Phibro Tech Inc. (formerly known as Southern California Chemical) at 8851 Dice Road (cross/up-gradient), VOCs, PCE, TCE, 1,1-DCE, 1,1-DCA, 1,2-DCA, CCl<sub>4</sub>, CHCl<sub>3</sub>, 1,1,1-TCA, were detected in the monitoring wells present at the facility. These pollutants were also detected in concentrations of the same order of magnitude at the subject Site, indicating a regional groundwater contamination problem.
- Seven facilities on the Cal-Sites list were located cross/up-gradient from the subject Site. The following facilities: Diversey Wyandotte, Southern California Chemical, Burdette Oxygen Company, Pilot Chemical Company, and Techni-Braze appeared to have the potential to affect the subject Site and appeared to contribute to the regional groundwater contamination. The remaining facilities, McKesson Chemical and Angeles Chemical Company, did not appear to have the potential to affect the subject Site; however, they appeared to contribute to the regional groundwater contamination.
- Pilot Chemical Company is a Leaking Underground Storage Tank Information System (LUSTIS) property located up-gradient from the subject Site and appears to have the potential to affect the subject Site.

In summary, Site activities occurring between 1924 through 1986 contributed to on-Site soil contamination. These contaminated soils were identified, characterized and remediated by Applied Geosciences Inc. in 1988. Subsequent phase II tests by SEACOR in May 1994 identified approximately 1,000 cubic yards of TRPH-impacted soil in the Northern Section of the Site. TRPH has not been identified in water samples taken at and around the Site.

Shallow ground water in the region, including the Site is contaminated with several VOC compounds. Monitoring well samples taken on-Site contained several metals at concentrations above their established drinking water standards. The RWQCB is aware of the regional ground water problem. The full nature and extent of the shallow ground water plume in the region has not been evaluated. Most of the facilities surrounding the Site appear to be Potentially Responsible Parties for the ground water contamination. Although several VOC compounds are known or reported used on-Site, previous assessments have not detected significant concentrations of VOC's in the soils at the Site.

Based on the information presented, this property may have contributed to the regional ground water problem. There is no regulatory mandate to conduct additional on-Site assessment at this time.

#### **Site Walkthrough**

Ms. Ruth A. Michelstein of Hygienetics performed the Site reconnaissance on May 11, 1999. Mr. Bill Choske, Building Engineer for the Los Nietos Business Center, accompanied Ms. Michelstein on the Site walkthrough and provided information regarding site conditions. Mr. Choske stated that he was not aware of any spills of hazardous materials or any other conditions at the Site that would adversely affect the environment. In addition, Hygienetics accessed the interiors of the 15 on-Site tenant spaces and obtained information concerning tenant activities and chemical and hazardous materials storage and handling practices. The following tenants occupied the on-Site buildings at the time of the reconnaissance:

- ACI Distribution  
9120 South Norwalk Boulevard  
Distributor of Glass
- Vacant  
9122 South Norwalk Boulevard
- Richmill U.S.A. Inc.  
9124 South Norwalk Boulevard  
Distributor of Industrial Tool Holders
- American Polytechnic Institute  
9128 South Norwalk Boulevard  
Occupational Training Institute

- Aberdeen  
9130 South Norwalk Boulevard  
Distributor of Computers and Components
- ITL  
9132 South Norwalk Boulevard  
Distributor of Industrial Tires
- Johnsonite  
9134 South Norwalk Boulevard  
Distributor of Vinyl and Rubber Products
- Kichler (Vacant)  
9138 South Norwalk Boulevard  
Access not available as the tenant is vacating the premises
- Air Cruisers Company  
9140 South Norwalk Boulevard  
Overhaul Evacuation Slides
- Tyed TMT Group  
9142 South Norwalk Boulevard  
Distributor of Auto Parts
- PDL Inc.  
9160 South Norwalk Boulevard  
Courier Service
- IDC  
11925 East Los Nietos Road  
Security Service and Monitoring Company
- Nelson Sports Inc.  
11929 East Los Nietos Road  
Manufacturer and Distributor of Snowboards
- NexPen Inc.  
11931 East Los Nietos Road  
Pen Marketer
- Vacant  
11933 East Los Nietos Road



The Site reconnaissance revealed that a number of on-Site tenants have changed since the previous Phase I ESA Update was performed. Based on our observations on May 11, 1999 none of the existing tenants are likely to pose an environmental concern to the Site.

### **Site Description**

The Site can be located on the United States Geological Survey (USGS) Whittier Quadrangle, 7.5 Minute Series Topographic Map (1965, Photorevised 1981) at the Latitude 33°57'28", Longitude 118°04'13" or approximate Universal Transverse Mercator coordinates 401,185 m East 3,757,630 m North in Zone 11. Based on the topographic map, the Site elevation is approximately 155 feet above mean sea level (amsl). The Site and surrounding areas are located in an area of relatively flat topographic gradient. The topography of the Site vicinity slopes moderately downward toward the southwest. Based on the topographic map and previous on-Site investigations, the assumed groundwater flow is southwest toward the San Gabriel River. A copy of the topographic map showing the Site and area is presented as Figure 1.

According to the April 1996 Fugro Phase I ESA update, the Site is situated on an irregularly shaped 11.7-acre parcel of land. The Site is improved with four, one-story buildings constructed circa 1988. The buildings are utilized for industrial office and warehousing purposes.

The Site structures are of tilt-up concrete construction with slab-on-grade foundations. The floors are covered with vinyl floor tile or sheeting and carpeting in the office build-out sections and are left as bare concrete in the warehouse areas. The roof is flat and of built-up construction. The interior ceilings consist of lay-in acoustical ceiling panels in the office build-out sections and are generally left open in the warehouse areas. The interior finishes include painted gypsum wallboard walls in the office build-out sections. Fluorescent light fixtures were observed throughout the Site buildings. The structure is surrounded by concrete walkways, asphalt parking lots and driveways, and landscaped areas.

Electricity is supplied to the buildings from four pad-mounted transformers located on the property. A diesel-powered emergency generator provides emergency power to IDC, which is an on-Site tenant that provides security service and monitoring, located at 11925 East Los Nietos Road. This generator is located in an area behind the building occupied by the tenant and appeared to be relatively new and in good condition at the time of the Site reconnaissance.

There are no surface water bodies or wetlands on the Site, which is located in an upland area. The nearest significant surface water is the San Gabriel River, located approximately 1.0-mile west of the Site.

Groundwater flow typically mimics surface topography. According to the April 1996 Fugro Phase I ESA update and based on a review of the topographic map, groundwater in the overall direction of groundwater flow for the region is to the southwest. However, a variety of factors can affect the path of groundwater flow, such as joints and fractures in bedrock, buried river valleys and stream beds, surface recharge, groundwater pumpage, as well as sewer lines and other subsurface utilities. According to the April 1996 Fugro Phase I ESA update report, the

estimated depth to groundwater beneath the Site is approximately 37-42 feet. There are no drinking water wells on the Site. The San Gabriel Valley Water Company supplies potable water to the Site. Five groundwater-monitoring wells are currently located on the subject Site.

According to the April 1996 Fugro Phase I ESA update report, the Flood Insurance Rate Map (FIRM) covering the Site was reviewed. The Site is located within Zone C, an area of minimal flooding. The community and panel number for the flood zone map covering the Site is 060158 0001 B and the effective date is April 15, 1980.

Stormwater runoff from roof drains and paved areas is collected by drainage swales, leading to catch basins and a storm drain, located at the northeastern intersection of Norwalk Boulevard and Los Nietos Road, is used to collect on-Site runoff surface waters. No surface staining or obvious noxious odors were noted in the vicinity of the storm drains, which might indicate disposal of hazardous waste.

The Site reconnaissance noted no significant changes at the subject Site relative to the April 1996 Fugro Phase I ESA update report.

#### **Oil and Hazardous Materials Storage and Use**

Evidence of on-Site USTs or ASTs was not observed during the Site reconnaissance. According to the April 1996 Fugro Phase I ESA update report and other previous reports, four (4) USTs previously occupied the subject Site. The tanks were removed according to LADPW supervision. Please refer to the "Previous Reports" section of this report for a complete discussion of these USTs.

There are no elevators in use on the subject Site.

Chemical storage at the Site typically consisted of various household strength cleaners and small quantities of paint and maintenance supplies, which were stored in their original manufacturer's containers in various locations throughout the buildings. At the time of the reconnaissance, the following additional chemicals and/or hazardous wastes were identified in the following locations:

#### **Richmill U.S.A., Inc. at 9124 South Norwalk Boulevard**

##### **Chemical Storage**

- 20, 16-ounce cans of spray paint;
- 2, 1-quart bottles of motor oil.

##### **Hazardous Waste Storage**

- 1 Safety Kleen Parts Washing Bin with Aqueous Cleaning Solution.

Richmill U.S.A., Inc. is a distributor of industrial tool holders. The spray paint and motor oil were neatly stored on metal shelves, in their original packaging, with no signs of staining. No signs of staining or leaking and pooling fluids were noted around the parts

washing bin. Safety Kleen replenishes the aqueous parts washing solution once every month and properly disposes of spent solvent.

#### **Air Cruisers Company at 9140 South Norwalk Boulevard**

##### Chemical Storage

- 2, 5-gallon containers of toluene;
- 2, 5-gallon containers of MEK;
- 1, 5-gallon container of isopropanol;
- 4, 1-gallon containers of adhesive;
- 2, 1-gallon containers of MEK;
- 1, 1-gallon container of toluene;
- 1, 1-gallon container of naphtha;
- 2, 1-quart cans of paint;
- 1, 16-ounce can of spray paint;
- 2 small, contained pans of toluene;
- 2 small containers of marine wax;
- 12 tanks of compressed Nitrogen gas;
- 2 tanks of compressed CO<sub>2</sub> gas.

Air Cruisers Company overhauls evacuation slides for the military. All chemicals were noted to be neatly stored in two yellow flammables cabinets. The compressed gas cylinders were appropriately chained to the warehouse in the rear portion of the tenant space. No signs of staining were noted around the storage or chemical usage areas. No hazardous waste is generated or stored in this tenant space. Hygienetics also noted the presence of an air compressor, which was housed inside a shed in the exterior yard of the tenant space.

#### **PDL Inc. at 9160 South Norwalk Boulevard**

##### Chemical Storage

- 4 tanks of compressed propane gas.

PDL Inc. is a courier service that utilizes propane gas in operation of its forklifts. The propane tanks were noted to be stored appropriately inside a cage.

#### **IDC at 11925 East Los Nietos Road**

IDC operates a security service and monitoring company and utilizes a diesel-powered emergency generator in case power is lost at the facility. The generator appeared to be relatively new and in good condition at the time of the Site reconnaissance with no evidence of staining or leaking and pooling fluids.

**Nelson Sports Inc. at 11929 East Los Nietos Road**

**Chemical Storage**

- 1, 55-gallon drum of resin composite material;
- 2, 5-gallon containers of diethylene triamine;
- 1, 5-gallon container of hydraulic oil;
- 5, 1-gallon containers of latex paint;
- 5, 16-ounce cans of spray wood finish;
- Small quantities of adhesive and lacquer.

Nelson Sports Inc. is a light manufacturer and distributor of snowboards. A hydraulic form machine is utilized in the manufacture of snowboards and appeared to be relatively new at the time of the Site reconnaissance. All materials were stored on metal shelves, with the exception of the hydraulic oil, which was stored on the floor next to the hydraulic form. No signs of staining or leaking and pooling fluids were noted around the machine or storage areas.

Several on-Site tenants, which include ITL at 9132 South Norwalk Boulevard, Johnsonite at 9134 South Norwalk Boulevard, and Tyed TMT Group at 9142 South Norwalk Boulevard, utilize electric forklifts and handle battery-charging stations for these forklifts. Hygienetics did not note any staining or leaking and pooling fluids from any of the on-Site batteries at the time of the Site reconnaissance.

The storage and use of these chemicals does not represent an environmental concern to the Site at this time. According to the various contacts at each of the tenant spaces, Material Safety Data Sheets (MSDS) for the materials on-Site are kept in the front offices of the spaces that utilize such materials.

Mr. Choske indicated that no release or spill has been noted since April 1996 Fugro Phase I ESA update report and Site conditions have not significantly changed since that time.

**Surrounding Properties**

The Site vicinity is characterized as industrial in nature. No significant changes to the surrounding areas were noted with respect to the April 1996 Fugro Phase I ESA update report. Industrial buildings to the north and to the east abut the Site. To the south is a 2-track railroad followed by East Los Nietos Road, beyond which lie industrial buildings. The Site is bordered to the west by South Norwalk Boulevard, which is followed by the railroad right-of-way, a commercial building, and a small food stand.

**Database Information**

Hygienetics performed a regulatory search using search radii specified in Archon's May 1998 Phase I Environmental Site Assessments Scope of Services, Attachment C-1. The results of the search, performed using Vista Database Services, report dated May 6, 1999, are presented below.

<p style="text-align: center;"><b>Table 1</b> <b>Regulatory Agency Records Search</b> 9120-9160 South Norwalk Boulevard and 11925-11933 East Los Nietos Road Santa Fe Springs, California 90670</p>			
<b>Regulatory Database Searched</b>	<b>Search Radius</b>	<b>Site Listed in Database</b>	<b>Number of Sites Within Search Radius</b>
USEPA National Priorities List (NPL, or Federal Superfund listing)	1 mile	No	1
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)	½ mile	No	13
USEPA Resource Conservation and Recovery Information System – Treatment, Storage, or Disposal Facilities (RCRIS-TSD)	½ mile	No	0
USEPA Resource Conservation and Recovery Information System Generators (RCRIS-Gens)	Site & Abutters	No	2
ERNS	Site & Abutters	No	0
State Sites (CERCLIS Equivalent)	½ mile	No	11
State Priority Sites	1 mile	No	3
Solid Waste Facilities/Landfill Sites (SWF/LS)	½ mile	No	2
Leaking Underground Storage Tanks (LUST)	½ mile	No	20
Underground Storage Tanks (UST)	Site & Abutters	Yes	0
State Spills Incidents	Site & Abutters	No	0
FINDS	½ mile	No	0
TRIS	½ mile	No	3
CORRACTS	1 mile	No	5

The following subsections provide a discussion of selected sites within the search radii that have been identified in the various regulatory databases listed above.

Hygienetics reviewed Federal and State regulatory agency database information provided by VISTA concerning activities which may be of environmental concern in the general vicinity of the Site. The database search was conducted using publicly available regulatory records, as detailed in their report dated May 6, 1999. Please refer to Attachment A for a copy of the VISTA search report with a listing of search parameters, database summary listing, site specific detail printouts and location maps. Regulatory listings are limited and include only those sites which are known to the regulatory agencies at the time of publication to be contaminated or in the process of evaluation for potential contamination.

Please note that some facilities are listed with unknown addresses (not Geocoded) or other unknown data fields. Such occurrences are the result of limitations in the regulatory database itself, and are beyond our control. Eighteen orphan or unmapped properties were identified in the database search. All these properties were determined to be greater than one-half mile from the Site and are not an environmental concern to the Site.

**Federal Environmental Record Sources:**

**United States Environmental Protection Agency (USEPA) National Priority List (NPL)**

The Site is not listed as a NPL facility. There is one property included in the NPL within a one-mile radius of the Site.

**Waste Disposal Inc.** at 12731 East Los Nietos Road is located approximately 4,435 feet southeast and down/cross-gradient from the Site. Little information concerning the nature of the contamination at this property was contained in the database. Due to the distance and direction of this facility hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**USEPA Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS)**

The Site is not listed as a CERCLIS facility. There are thirteen CERCLIS-listed facilities within a one-half mile radius of the Site.

**McKesson Chemical Company** at 11600 Pike Street is located approximately 875 feet southwest and down-gradient from the Site. According to the VISTA report, this facility handles(d) non-corrosive toxic waste in the form of sodium hydrochloride, manufactured/distributed organic/inorganic materials, and has(d) tanks, drums (above or below ground unknown). This facility is not on the NPL list and is not included on the docket and no further remedial action has been planned. Due to its direction down-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Diversey Wyandotte** at 8921 Dice Road is located approximately 1,250 feet east and up/cross-gradient from the Site. According to the VISTA report, this facility handled acids, bases, inorganics, organics, sodium hydroxide, sodium carbonate, phosphoric acid, and various vessel washings. This facility also utilized drums, tanks, underground injection, and was a RCRA regulated generator treat store dispose facility (non-handler). The lead agency for this facility is the Department of Toxic Substances Control (DTSC) and no other information was provided. According to the April 1996 Fugro Phase I ESA update report, the DTSC issued a closure letter for this property in 1992; however, remediation of the property was not discussed by the DTSC at the time. Furthermore, fifteen (15) groundwater injection wells were utilized at this facility for disposal of untreated caustic and acid solutions, which was not assessed or reviewed by the DTSC. The use of groundwater injection wells at this facility may represent an environmental concern to the subject Site.

**Dice Road Los Nietos Road Dump** at 9165 Dice Road is located approximately 1,250 feet southeast and cross-gradient from the Site. According to the VISTA report, this facility handles(d) rubbish and trash and is a land disposal facility. No information

regarding the specific type of contamination at the facility was provided. Due to its distance and direction hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Southern California Chemical Company Inc.** at 8851 Dice Road is located approximately 1,425 feet northeast and up-gradient from the Site. According to the VISTA report, this facility has(d) surface impoundments, ASTs for holding hazardous waste, copper sludge cement ponds and collection sump, USTs (diesel and gasoline), USTs (hazardous wastes, acid solutions), and drums. This facility also handles(d) heavy metals (copper, chromium, zinc, nickel, ammonia zinc oxide), acids (chromic, sulfuric, hydrochloric), bases (alkaline waste water), waste water, surface runoff, sludge from treatment pond, inorganics (chloride, chlorine), bases (sodium hydroxide), and spent ammonical etchant, sodium, and ammonia. According to the April 1996 Fugro Phase I ESA update report, this facility name is the former name of the Phibro Tech Inc. facility at the same address. Furthermore, this facility appears to have separate metals and VOCs groundwater contamination plumes for which groundwater monitoring appeared to be ongoing. Due to its direction hydrogeologically up-gradient from the Site, this property may represent an environmental concern to the subject Site.

**Liquid Air Inc.** at 8832 South Dice Road is located approximately 1,530 feet east-northeast and cross/up-gradient from the Site. According to the VISTA report, this facility has(d) ASTs (acetylene, carbon dioxide, nitrous oxide, argon, oxygen, nitrogen, helium, hydrogen, propane, fuel gas, lime and acetylene sludge). This facility also handles(d) spray cooling water, acetylene sludge (which was discharged into the Coyote Creek), and other product wastes (carbide sludge, cooling water bleed off, caustics, brine, lubricating oil, and lime). According to the April 1996 Fugro Phase I ESA update report, this facility had a history of improper waste disposal, which included disposing of cooling water, caustic solutions, and carbide sludge in unlined pits. TCA disposal was not documented at this facility and groundwater monitoring was not performed. Additionally, an acetone-filled UST failed an integrity test and no further documentation for the UST is available. Fugro also located this facility to the northeast and stated that it could potentially affect the subject Site. Based upon its distance and potentially up-gradient direction from the Site, the facility may represent an environmental concern to the Site.

**Burdett Oxygen Company of California #1** at 8838 South Dice Road is located approximately 1,530 feet east-northeast and cross/up-gradient from the Site. According to the VISTA report, this facility is a medium priority facility; however, no information concerning the type of contamination at the facility is disclosed in the VISTA report. According to the April 1996 Fugro Phase I ESA update report, this facility was also known as Liquid Air Inc., which is discussed in detail in the preceding paragraph. Based upon its distance and potentially up-gradient direction from the Site, the facility may represent an environmental concern to the Site.



**Pilot Chemical Company** at 11756 Burke is located approximately 1,630 feet northeast and up-gradient from the Site. According to the VISTA report, this facility handles(d) sulphuric acid sludge, sulphonc acid sludge, sulgone sludge (containing some xylene), and sewer inceptor sludge. This facility also utilized ASTs (hazardous waste) and drums and was documented as having soil contamination. A note in the VISTA report indicated that the Santa Fe Springs Department of Public Works was to be contacted in September 1987 for case follow-up. According to the April 1996 Fugro Phase I ESA update report, two UST removal letters, dated February 1991 and June 1994, were issued by the LADPW concerning the removal of 3 USTs. The UST removals were deemed proper in both cases and, in both cases, the LADPW awaited closure pending approval of the soil and groundwater contamination issued by the RWQCB. Later in 1991, soil borings were advanced and groundwater monitoring wells were developed for the facility. Sampling was conducted in 1995 indicating detectable concentrations of surfactant, TCE, 1,1-DCA, 1,1-DCE, carbon tetrachloride, and chloroform. Due to its direction and hydrogeologically up-gradient position to the Site, this property may represent an environmental concern to the subject Site.

**Los Angeles By-Products** at 9615 South Norwalk Boulevard is located approximately 1,850 feet south and down-gradient from the Site. According to the VISTA report, this facility handles(d) non-decomposable materials and was a landfill facility. No information disclosing the type of contamination present at this facility was provided in the VISTA report. Due to its distance and direction down-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Fine Line Paint Company** at 12200 East Los Nietos is located approximately 1,850 feet southeast and down/cross-gradient from the Site. According to the VISTA report, this facility handles(d) solvents and organics (wash thinner paint sludge). This facility also utilizes(d) drums, USTs (3 solvent tanks and 2 raw materials storage tanks), and surface impoundments/sump. This facility also had documented soil contamination along the railroad tracks from wastewater discharge containing thanium, chromium, cadmium, lead, and mercury. Due to its distance and direction cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**West Bent Bolt** at 8623 South Dice Road is located approximately 2,160 feet northeast and up/cross-gradient from the Site. According to the VISTA report, this facility was involved in the manufacturing of metal bolts, screws, machinery, zinc plating, etc and handles(d) sludges (whittish grey powder), cyanide (overflow rinse form zinc plating neutralized sulfuric acid and sodium hydroxide), and oily liquids. This facility also utilizes(d) drums, ASTs (hazardous waste holding tanks), a 2-3 foot wide ditch, a sump (discharge to the sewer), and clarifiers (3). This facility has documented evidence of soil contamination, of oil in soil spill, and 30-gallon and 30-40 gallon cyanide spills, which were cleaned up. Due to its distance from the Site, this property is not likely to represent an environmental concern to the subject Site.



**Parker Hannifin Corporation** at 11808 Burke Street is located approximately 2,375 feet northeast and up/cross-gradient from the Site. The status for this facility is "preliminary assessment" and information disclosing the type of contamination on the subject Site was not provided in the VISTA report. Due to its distance, this facility is not likely to represent an environmental concern to the subject Site.

**Foremost McKesson Inc.** at 9005 Sorenson Avenue is located approximately 2,480 feet east and cross-gradient from the Site. According to the VISTA report, this facility handles(d) corrosive and ignitable wastes, acids, and solvents. This facility also utilizes(d) tanks and drums and has a hazard target groundwater potential. According to the April 1996 Fugro Phase I ESA update report, groundwater sampling information for this property was available at the DTSC and indicates the presence of the following VOCs in the groundwater: PCE, TCE, 1,1-DCE, 1,1,1-TCA, methylene chloride, and cis-1,2-DCE. Furthermore, this facility may have contributed to the regional groundwater contamination problem. Due to its distance and direction cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**USEPA Resource Conservation and Recovery Act (RCRA), Treatment, Storage and/or Disposal Facility (TSD)**

The Site is not listed as a RCRA TSD facility. There are no RCRA TSD facilities listed within a one-mile radius of the Site.

**USEPA Resource Conservation and Recovery Information System (RCRIS) Hazardous Waste Generators**

The current on-Site tenants are not listed as RCRIS generators. None of the abutting properties are listed as RCRIS generators.

The former on-Site address, which was 9100 South Norwalk Boulevard, with National Productions Systems listed as the occupant is on the VISTA report as a RCRIS generator. Please see the "Previous Reports" Section of this report for a more complete information concerning the former on-Site tenant.

**USEPA Emergency Response Notification System (ERNS)**

Neither the Site nor any abutting properties appear on the ERNS list.

**State Environmental Record Sources:**

**State Equivalent CERCLIS List Site (SCL)**

The Site is not listed as SCL facility. There are eleven SCL sites within a one-half mile radius of the Site.

**All Pure Chemical Company** at 11600 Pike Street is located approximately 845 feet southwest and down-gradient of the Site. The status of the facility is unknown and this case has been referred to another agency, which was not disclosed in the VISTA report. Due to the distance and direction of this facility hydrogeologically down-gradient to the Site, this property does not represent an environmental concern to the subject Site.

**Diversey Wyandotte** at 8921 Dice Road is located approximately 1,260 feet east and up/cross-gradient of the Site. This facility status is not known and has been referred to the DTSC. A more complete discussion of this facility is provided in the section above. The use of groundwater injection wells at this facility may represent an environmental concern to the subject Site.

**Dice Road Los Nietos Road Dump** at 9165 Dice Road is located approximately 1,265 feet southeast and cross-gradient from the Site. The status of the facility is unknown and no further action is required by the DTSC. Due to its distance and direction hydrogeologically cross-gradient from the Site, this property does not represent an environmental concern to the subject Site.

**Southern California Chemical** at 8851 Dice Road is located approximately 1,425 feet northeast and up-gradient from the Site. The facility was a former annual workplan site (AWP), which was referred to RCRA and the status is unknown. Due to its direction hydrogeologically up-gradient from the Site, this property may represent an environmental concern to the subject Site.

**Liquid Air Inc.** at 8832 South Dice Road is located approximately 1,530 feet east-northeast and cross/up-gradient from the Site. The status of this facility is unknown and no further action is required by the DTSC. According to the April 1996 Fugro Phase I ESA update report, this facility is located to the northeast (potentially up-gradient) and stated that it could potentially affect the subject Site. Based upon its distance and potentially up-gradient direction from the Site, the facility may represent an environmental concern to the Site.

**Burdett Oxygen Company of California #1** at 8838 South Dice Road is located approximately 1,530 feet east-northeast and cross/up-gradient from the Site. A "preliminary assessment required/recommended" has been placed on this facility, which is also a medium priority CERCLIS facility. According to the April 1996 Fugro Phase I ESA update report, this facility name is an alternative name for Liquid Air Inc., which is discussed in detail in the section above. Based upon its distance and potentially up-gradient direction from the Site, the facility may represent an environmental concern to the Site.

**Los Angeles By-Products** at 9615 South Norwalk Boulevard is located approximately 1,850 feet south and cross-gradient from the Site. The status of this facility is unknown and there is no further action required by the DTSC. Due to its distance and direction cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Fine Line Paint Company** at 12200 East Los Nietos Road is located approximately 1,850 feet southeast and cross-gradient from the Site. The status of this facility is unknown and has been referred to another agency. Due to its distance and direction cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Techni Braze Inc.** at 11845 Burke Street is located approximately 2,530 feet northeast and up-gradient from the Site. This facility is a former AWP site and has been referred to the Regional Water Quality Control Board (RWQCB) and the status is unknown. According to the April 1996 Fugro Phase I ESA update report, this facility may have contributed to the regional groundwater contamination problem. Since Techni Braze Inc. may be a regional PRP and is up-gradient to the subject Site, it may represent an environmental concern to the Site, notwithstanding the distance.

**West Bent Bolt** at 8623 South Dice Road is located approximately 2,160 feet northeast and up-gradient from the Site. The status of this facility is unknown and has been referred to another agency, which was not disclosed in the VISTA report. Due to its distance, this property is not likely to represent an environmental concern to the subject Site.

**Aerospace Rivet** at 8535 South Dice Road is located approximately 2,480 feet northeast and up-gradient from the Site. The lead agency for this facility was the DTSC, which requires no further action, and the current status of this facility is unknown. Due to its distance from the Site, this property is not likely to represent an environmental concern to the subject Site.

#### **State Priority Sites (SPL)**

The Site is not listed as SPL facility. There are three SPL sites within a one-mile radius of the Site.

**Angeles Chemical Company Inc.** at 8915 Sorenson is located approximately 2,480 feet east and cross-gradient from the Site. This facility is an AWP site and the lead agency is the DTSC. The current status of this facility is unknown. According to the April 1996 Fugro Phase I ESA update report, this facility may have contributed to the regional groundwater contamination problem. The Angeles Chemical Company Inc.'s potential as a regional PRP makes it a potential environmental concern to the subject Site, notwithstanding its distance and hydrogeologically cross-gradient position.

**McKesson Chemical Company** at 9005 Sorenson is located approximately 2,480 feet east and cross-gradient from the Site. This facility is an AWP site and the lead agency is the DTSC. The current status of this facility is unknown. Due to its distance and direction hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**Waste Disposal Inc.** at 12731 East Los Nietos Road is located approximately 4,435 feet southeast and down/cross-gradient from the Site. This facility is an AWP site and is EPA Fund Financed. The current status of this facility is "currently on final NPL". Due to its distance and direction hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

#### **State Solid Waste Disposal Facilities (SWF/LF)**

The Site is not listed as a SWF/LF facility. There are two solid waste landfills located within a one-mile radius of the Site.

**Dice Road** at 9165 Dice Road is located approximately 1,265 feet southeast and cross-gradient from the Site. The type of disposal facility is not listed, nor are the types of waste accepted at this facility. Due to its distance and direction hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

**L.A. By-Products – Santa Fe Springs** at 9615 South Norwalk Boulevard is located approximately 1,900 feet south and down/cross-gradient from the Site. The type of disposal facility is not listed, nor are the types of waste accepted at this facility. Due to its distance and direction hydrogeologically cross-gradient from the Site, this property is not likely to represent an environmental concern to the subject Site.

#### **Leaking Underground Storage Tanks (LUSTs)**

The Site is not listed as a LUST facility. Twenty LUST facilities were identified by the database within one-half mile of the Site. These facilities, their distance and direction from the facility and their status are as follows:

TABLE 2			
PROPERTY	DISTANCE	DIRECTION	STATUS
ACI Glass 9010 Norwalk Boulevard	300 feet	North (cross/up-gradient)	Case Closed; Soil Only
C.F. Peng Service Station 8905 Norwalk Boulevard	600 feet	North (cross/up-gradient)	Preliminary Site Assessment Underway; Soil Only
Tube Service Co. 9351 Norwalk Boulevard	525 feet	South (cross/down- gradient)	Case Closed; Soil Only
E.A. Mendoza Inc. 11574 Perkins	630 feet	North (cross/up-gradient)	Case Closed; Soil Only
Triangle Distribution 12065 East Pike Street	790 feet	South (down-gradient)	Preliminary Site Assessment Workplan Required; Soil Only

TABLE 2			
PROPERTY	DISTANCE	DIRECTION	STATUS
Barrett Service Station 8728 Norwalk Boulevard	1,270 feet	North (cross/up-gradient)	Case Closed; Other Groundwater
T-Chem Products 9028 South Dice Road	1,210 feet	East (cross-gradient)	Case Closed; Soil Only
Diversey Corp. 8921 Dice Road	1,270 feet	East (up/cross-gradient)	Remediation (VOC Contamination)
California Corrugated 11600 East Los Nietos Road	1,270 feet	Northwest (cross-gradient)	Case Closed; Soil Only
Liquid Air Inc. 8832 South Dice Road	1,530 feet	East-northeast (cross/up-gradient)	Case Closed; Soil Only
Pilot Chemical Company 11756 Burke	1,635 feet	Northeast (up-gradient)	Further Site Assessment Underway; Other Groundwater (VOC Contamination)
Flight Trucking 11770 Burke Street	1,740 feet	Northeast (up-gradient)	Case Closed; Soil Only
Fine Line Paint Co. 12200 East Los Nietos Road	1,850 feet	Southeast (down/cross- gradient)	Case Closed; Other Groundwater
Circle K 11462 Slauson	2,110 feet	North (up/cross-gradient)	No Action
Shell Station 11515 Slauson Avenue	2,215 feet	North (up/cross-gradient)	Post Remedial Action Underway; Other Groundwater
Techni Braze Inc. 11845 Burke Street	2,530 feet	Northeast (up-gradient)	Site Assessment
Santa Fe Springs Truck Terminal 9750 Norwalk Boulevard	2,375 feet	South (down/cross- gradient)	Case Closed; Soil Only
Southern Steel Supply Co. 12350 Los Nietos Road	2,480 feet	Southeast (down/cross- gradient)	Case Closed; Soil Only
Angeles Chemical Co. Inc. 8915 Sorenson	2,480 feet	East (cross-gradient)	Case Closed; Other Groundwater
McKesson Chemical Co. 9005 Sorenson	2,480 feet	East (cross-gradient)	Leak Suspected, Not Confirmed

According to the April 1996 Fugro Phase I ESA update report, E.A. Mendoza at 11574 Perkins Avenue was located 0.2-mile up-gradient from the subject Site. This facility had two oil sumps removed in 1991 and a subsequent subsurface investigation in these areas

indicated TRPH contamination. The levels of contamination at this facility were reportedly such that the subject Site would likely be impacted. According to the VISTA report requested by Hygienetics, the LUST at this facility impacted the soil only and has a case closed status. Due to its distance, status, and media affected, this facility does not represent an environmental concern to the Site.

Of the twenty LUSTIS facilities listed above, three facilities could potentially impact the subject Site. The remaining facilities do not represent an environmental concern to the Site to their status, distance, and/or direction hydrogeologically cross/down-gradient from the subject Site. These facilities, Diversey Corp at 8921 Dice Road, Pilot Chemical Company at 11756 Burke and Techni-Braze at 11845 Burke Street are all potential contributors to the area groundwater contamination and up-gradient from the subject Site.

#### **Registered Underground Storage Tanks (USTs)**

None of the current Site tenants or addresses are listed on the registered UST list.

**Trammell Crow Company** at 9100 South Norwalk Boulevard, which is listed on the UST list twice, was the Site developer and the former Site address, respectively. This address is not listed on the LUST list.

**ACI Glass Company** at 9010 South Norwalk Boulevard is located approximately 300 feet to the north and cross/up-gradient from the Site and is an abutting property to the Site. This facility is included on the LUST list as affecting the soil only and has a case closed status. This facility does not represent an environmental concern to the Site.

#### **Facility Index System (FINDS)**

The Site is not listed on the FINDS database. There are no FINDS facilities listed within a one-quarter mile radius of the Site.

#### **Toxic Release Inventory System (TRIS)**

The Site is not listed as a TRIS facility. There are three TRIS facilities listed within a one-quarter mile radius of the Site.

**Chemifax** at 11641 Pike Street is located approximately 740 feet southwest and down-gradient to the subject Site. The VISTA report discloses the release of 500 pounds of hydrochloric acid, 500 pounds of an unknown substance, and 1,000 pounds of phosphoric acid at this facility. Due to the distance and direction of this facility hydrogeologically down-gradient from the Site, this facility does not represent an environmental concern to the subject Site.

**All Pure Chemical Company** at 11600 Pike Street is located approximately 850 feet southwest and down/cross-gradient to the subject Site. The VISTA report discloses the release of 10 pounds of chlorine at this facility. Due to the distance and direction of this

facility hydrogeologically down/cross-gradient from the Site, this facility does not represent an environmental concern to the subject Site.

**T-Chem Products** at 9028 South Dice Road is located approximately 1,215 feet east and cross-gradient to the subject Site. The VISTA report discloses the release of 5 pounds of chlorine and 2,421 pounds of ammonia at this facility. Due to the distance and direction of this facility hydrogeologically cross-gradient from the Site, this facility does not represent an environmental concern to the subject Site.

### RCRA Corrective Actions (CORRACTS)

The Site is not listed as a CORRACTS facility. There are five CORRACTS facilities listed within a one-mile radius of the Site.

TABLE 3			
PROPERTY	DISTANCE	DIRECTION	STATUS
Whittier Plating Co. Inc. 11642 East Pike Street	850 feet	Southwest (down/cross-gradient)	Low Priority
Diversey Corp. 8921 Dice Road	1,265 feet	East (up/cross-gradient)	Medium Priority; Stabilization Measures Evaluation Complete
Phibro Tech. Inc. 8851 Dice Road	1,425 feet	East (up-gradient)	High Priority; RFI Imposed, RFI Workplan Approved, Stabilization Measures Evaluation Complete, CMS Workplan Approved, CMS Approved.
Foremost McKesson Inc. 9005 Sorenson Ave.	2,480 feet	East (cross-gradient)	Medium Priority; RCRA Facility Assessment Complete, RFI Imposed, RFI Approved, Stabilization Measures Evaluation Complete, CMS Approved, Date for Remedy Selection, Corrective Measures Design/Investigation Workplan Approved, Stabilization Measures Complete.
Sur Lite Corp.	4,170 feet	Northeast (up-gradient)	Not Reported

Two facilities, Diversey Corp. at 8921 Dice Road and Phibro Tech Inc. at 8851 Dice Road, appear to have a potential to affect the subject Site. According to the April 1996 Fugro Phase I ESA update report, both Diversey Corp. and Phibro Tech Inc. are located to the northeast of the Site. Due to their direction hydrogeologically up/cross-gradient from the Site, these facilities may pose an environmental concern for the subject Site.

Due to their distance and direction hydrogeologically cross-gradient from the Site, the other noted facilities do not represent an environmental concern to the subject Site.

#### **Municipal And Local Authorities:**

Hygienetics has requested information from the Santa Fe Springs Fire Department. At the time of this report, Hygienetics had not received a response to this request; however, any pertinent information will be included in an addendum to this report.

#### **Additional Record Sources:**

According to information obtained from the Santa Fe Springs Fire Department, Air Cruisers at 9140 South Norwalk Boulevard has a Hazardous Materials Business Plan on file. The other on-Site tenants are not required to file business plans with the SFSFD due to the small quantities (<55-gallons) of their on-site storage. No USTs or ASTs are registered for the Site addresses.

The City of Santa Fe Springs and the Regional Water Quality Control Board were contacted with respect to ground water flow in the area of the subject Site. Both agencies stated the ground water flow is to the southwest in this area.

Hygienetics requested information from the South Coast Air Quality Management District (SCAQMD) for the subject Site. At the time of this report, Hygienetics had not received a response from the SCAQMD; however, any pertinent information will be included in an addendum to this report.

#### **Radon**

Since the Site is located within EPA Radon Zone 2 and no previous radon data was provided by previous available reports, Hygienetics performed a limited survey for the possible presence of radon gas accumulating in the building by collecting five representative radon samples on May 11, 1999. The samples were shipped to Niton Laboratory of Bedford, Massachusetts, an EPA-approved provider of radon analytical services. Results indicated that the radon concentrations were 0.5 picoCuries per liter (pCi/l) or less. Samples were collected in the 9124, 9132, 9140, 9142, and 9160 South Norwalk Boulevard Buildings on the ground floor.

The EPA and the Surgeon General recommend that further action be taken when radon results are above 4.0 pCi/l (for residential property). All samples were well below this EPA recommended action level. Refer to Attachment D for radon results.



### **Lead**

Whereas the on-Site buildings were constructed in 1988 and are not utilized as multi-family residences, no lead-based paint sampling was conducted during this investigation and lead-based paint is not likely to represent an environmental concern to the Site.

During the Site visit, accessible areas were observed for evidence of damaged and/or peeling paint. These painted surfaces were in good condition at the time of the Site inspection.

### **Asbestos-Containing Materials (ACM)**

Whereas the on-Site buildings were constructed in 1988, an asbestos survey was not deemed necessary.

### **Conclusions**

Hygienetics found no evidence suggesting the presence of any USTs or aboveground storage tanks (ASTs) on the subject Site. Four USTs were formerly located on the subject Site; however, these were removed and discussed in a final closure report submitted November 28, 1989 and closure was attained from the LADPW in letter dated February 13, 1990.

"None of the tenants whose spaces were viewed are engaged in manufacturing activities and while hazardous materials are present, the quantities observed for a site this size are relatively low."

Hygienetics found only light manufacturing taking place in one of the tenant spaces; however, hazardous materials were handled by several of the on-Site tenants. All hazardous materials observed were being utilized and stored in an appropriate manner. Hygienetics did not note staining or leaking and pooling fluids in any of the areas observed.

Hygienetics performed a radon in air survey for the subject Site as part of our Phase I ESA update; however, no other environmental sampling was performed. All five radon samples collected by Hygienetics were below the EPA recommended action level of 4.0 pCi/l. Therefore, radon is not considered to pose an environmental concern to the Site.

According to the April 1996 Fugro Phase I ESA update report, seven facilities on the Cal-Sites list were located up/cross-gradient from the subject Site. The following facilities: Diversey Wyandotte, Southern California Chemical, Burdette Oxygen Company, Pilot Chemical Company, and Techni-Braze appeared to have the potential to affect the subject Site and appeared to contribute to the regional groundwater contamination. The remaining facilities, McKesson Chemical and Angeles Chemical Company, did not appear to have the potential to affect the subject Site; however, they appeared to contribute to the regional groundwater contamination.

On March 29, 1996, Fugro obtained and analyzed water samples. The five on-Site groundwater-monitoring wells were purged, sampled, and analyzed for TPH full fingerprint, VOCs, and a 17 metal scan. The metals present were at normal background levels except for the sample collected from well MW-4, the analysis of which indicated concentrations of cadmium, chromium, nickel, selenium, and silver in excess of the MCL. Various VOCs, all related to halogenated solvents, were detected in all five samples. Results did not conclusively attribute the contamination to the former on-Site operations or to the regional groundwater contamination problem.

During the performance of the Phase I ESA, Hygienetics obtained no additional information documenting the presence of ASTs or USTs on the subject Site in the past other than stated herein and in the previous environmental reports for this Site. Five ground water monitoring wells are located on the subject Site. Hygienetics did not collect water samples.

This investigation identified the Site conditions have not significantly changed with respect to the conditions in April 1996. A potential for environmental impairment to the Site appears to be possible from many of the surrounding properties.

In summary, Site activities occurring between 1924 through 1986 contributed to on-Site soil contamination. These contaminated soils were identified, characterized and remediated by Applied Geosciences Inc. in 1988. Subsequent phase II tests by SEACOR in May 1994 identified an additional 1,000 cubic yards (approximately) of TRPH-impacted soil in the Northern Section of the Site. This may be a "hot spot" remaining from previous on-site activities and has not been remediated to date. TRPH has not been identified in water samples taken at and around the Site.

Shallow ground water in the region, including the Site is contaminated with several VOC compounds. Monitoring well samples taken on-Site contained several metals at concentrations above their established drinking water standards. The RWQCB is aware of the regional ground water problem. The full nature and extent of the shallow ground water plume in the region has not been evaluated. Most of the facilities surrounding the Site appear to be Potentially Responsible Parties for the ground water contamination. Although several VOC compounds are known or reported to have been used on-Site, previous assessments have not detected significant concentrations of VOC's in the soils at the Site.

Based on the information presented, this property is environmentally impaired. Due to historical use this property may have contributed to the regional ground water problem. There is no regulatory mandate to conduct additional on-Site assessment at this time.

**Limitations**

Hygienetics personnel who prepared this Phase I ESA update report are familiar with applicable federal, state and local environmental laws and ordinances affecting the subject Site. Limitations to this report are presented in Attachment E.

Should you have any questions, please do not hesitate to contact myself at (949) 955-0201 or Kevin Kavanaugh in the Boston office at (800) 486-8546.

Sincerely,

Hygienetics Environmental Services



Ruth A. Michelstein, SST  
Associate Scientist  
Santa Ana Regional Office



Kevin J. Kavanaugh, L.S.P., CHMM  
Division Manager  
Environmental Engineering Services  
Archon Coordinator

## FIGURES



Approximate Direction of Groundwater Flow

Source: USGS Whittier, California Quadrangle, 7.5 Minute Series, 1965 (Photorevised 1981);  
Printed from TOPOI, Wildflower Productions, 1996.



Scale: As Shown

Archon Group LP.

Los Nietos Business Center  
9120-9160 South Norwalk Blvd. and  
11925-11933 East Los Nietos Road  
Santa Fe Springs, California

**Hygienetics**  
**Environmental**

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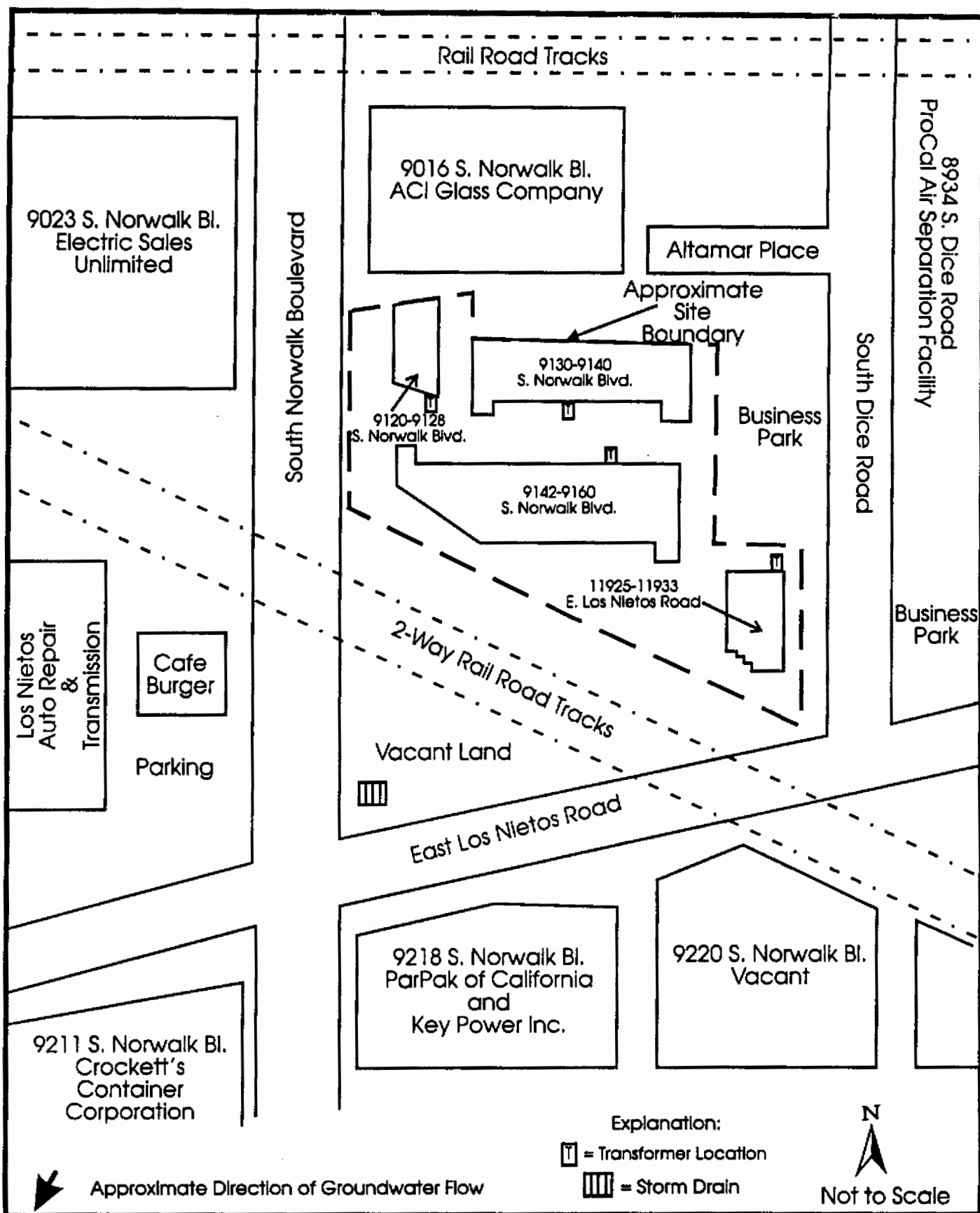
PROJECT NO.  
4433.011

PREPARED BY:  
RAM

**TOPOGRAPHIC MAP**

05/99

Figure 1



<p>Archon Group L.P.</p> <p>Los Nietos Business Center 9120-9160 South Norwalk Blvd. and 11925-11933 East Los Nietos Road Santa Fe Springs, California</p>	<p><b>Hygienetics Environmental</b></p> <p>Hygienetics Environmental Services, Inc. Suite A 1920 East Warner Avenue Phone: (949) 955-0201 Santa Ana, CA 92705 Fax: (949) 955-0965</p>	<p>PROJECT NO. 4433.011</p>	<p>Prepared By: RAM</p>	<p>05/99</p> <p>Figure 2</p>
		<p><b>Site Plan</b></p>		

FX-4: CBI/Trade Secret

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FX-4: CBI/Trade Secret

**ATTACHMENT B**

**PHASE I ENVIRONMENTAL SITE ASSESSMENT UPDATE**

**FUGRO WEST, INC., APRIL 1996**

FUGRO WEST, INC.

E10-8



**PHASE I  
ENVIRONMENTAL SITE ASSESSMENT UPDATE**

BANK OF AMERICA ASSET NO. BA-10100  
LOS NIETOS BUSINESS CENTER  
9120-9160 South Norwalk Boulevard and  
11925-11933 East Los Nietos Road  
Santa Fe Springs, California

April 1996

